# IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

In re: KrisJenn Ranch, LLC, et al.,	& & & & &	Chapter 11
Debtor.	§	Case No. 20-50805
KrisJenn Ranch, LLC, et al.,	§ §	
Plaintiffs,	§	
v.	§ §	
	§	Adversary No. 20-05027
DMA Properties, Inc., et al.,	§	
	§	
Defendants.	§ §	
	3	

## DMA PROPERTIES, INC., FRANK DANIEL MOORE, AND LONGBRANCH ENERGY, LP'S NOTICE OF APPEAL

#### TO THE HONORABLE COURT:

- 1. Pursuant to 28 U.S.C. § 158(a) and Rules 8001 and 8002 of the Federal Rules of Bankruptcy Procedure, Defendants/Third-Party Plaintiffs DMA Properties, Inc. and Frank Daniel Moore and Defendant Longbranch Energy, LP hereby appeal to the United States District Court for the Western District of Texas from the Final Judgment After Remand [Dkt. 329] and the accompanying Opinion After Remand [Dkt. 330] entered by the United States Chief Bankruptcy Judge Ronald B. King on March 26, 2024, in the above-referenced adversary proceeding.
- 2. **Parties.** The names of all parties to the foregoing Judgment After Remand and Opinion After Remand appealed from—and the names, addresses, and telephone numbers

of their respective attorneys—are as follows:

a. Cross-Appellants/Appellees/Defendants/Counter-Plaintiffs/Third-Party Plaintiffs DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP are represented by:

Christopher S. Johns
Bill Cobb
Michael Cotton
COBB & JOHNS PLLC<sup>1</sup>
13341 West U.S. Hwy. 290
Building 2
Austin, Texas 78737
512-399-3150
512-572-8005 fax
chris@cobbjohns.com
bill@cobbjohns.com
michael@cobbjohns.com

Timothy Cleveland
Austin Krist
CLEVELAND | KRIST PLLC<sup>2</sup>
303 Camp Craft Road
Suite 325
West Lake Hills, Texas 78746
737-900-7107
tcleveland@clevelandkrist.com
akrist@clevelandkrist.com

Natalie F. Wilson LANGLEY & BANACK, INC. 745 East Mulberry Suite 700 San Antonio, Texas 78212 210-736-6600 210-735-6889 fax nwilson@langleybanack.com

(DMA Properties, Inc. and Moore only)

<sup>&</sup>lt;sup>1</sup> Formerly Johns & Counsel PLLC.

<sup>&</sup>lt;sup>2</sup> Formerly Cleveland Terrazas PLLC.

Michael J. Black BURNS & BLACK, PLLC 750 Rittiman Road San Antonio, Texas 78209-5500 210-829-2020 210-829-2021 fax mblack@burnsandblack.com

(Longbranch Energy, LP only)

Jeffrey Duke
JF DUKE & ASSOCIATES
11819 Great Oaks Drive
College Station, Texas 77494
979-578-3808
jdukelaw@gmail.com

(Longbranch Energy, LP only)

b. Cross-Appellees/Appellants/Plaintiffs/Counter-Defendants/Third-Party Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row and Appellees/Third-Party Defendants Black Duck Properties, LLC and Larry Wright are represented by:

C. John Muller, IV CJ MULLER & ASSOCIATES, PLLC 111 W. Sunset Rd. San Antonio, Texas 78209 210-664-5000 john.muller@cjma.law

Ronald J. Smeberg
THE SMEBERG LAW FIRM, PLLC
4 Imperial Oaks
San Antonio, Texas 78248
210-695-6684
210-598-7357 fax
ron@smeberg.com

(Black Duck Properties, LLC only)

William P Germany GERMANY LAW 1250 NE Loop 410 Suite 725 San Antonio, Texas 78209 210-824-3278 210-824-3937 fax william@germanylaw.com

(Larry Wright only)

c. Appellee/ Third-Party Defendant John Terrill, pro se

John Terrill 12712 Arrowhead Lane Oklahoma City, Oklahoma 73120

3. **Opinion and Judgment appealed from:** The Final Judgment After Remand [Dkt. 329] and Opinion After Remand [Dkt. 330] entered on March 26, 2024 in the above-captioned case are attached as **Exhibit A** and **Exhibit B**, respectively.

## Respectfully submitted,

<u>/s/ Christopher S. Johns</u> Christopher S. Johns Texas Bar No. 24044849 Bill Cobb Texas Bar No. 00796372 Michael Cotton Texas Bar No. 24116229 COBB & JOHNS PLLC 13341 West U.S. Hwy. 290 Building 2 Austin, Texas 78737 512-399-3150 512-572-8005 fax chris@cobbjohns.com bill@cobbjohns.com michael@cobbjohns.com

# /s/ Timothy Cleveland

Timothy Cleveland
Texas Bar No. 24055318
Austin Krist
Texas Bar No. 24106170
CLEVELAND | KRIST PLLC
303 Camp Craft Road
Suite 325
West Lake Hills, Texas 78746
737-900-7107
tcleveland@clevelandkrist.com
akrist@clevelandkrist.com

Attorneys for Cross-Appellants/Appellees DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 9, 2024, a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid, at the address noted below.

Charles John Muller, IV CJ MULLER & ASSOCIATES, PLLC 111 W. Sunset San Antonio, TX 78209 ron@smeberg.com john.muller@cjma.law  Counsel for KrisJenn Ranch, LLC, Krisjenn Ranch, LLC—Series Uvalde Ranch, KrisJenn Ranch, LLC—Series Pipeline Row	Michael Black BURNS & BLACK PLLC 750 Rittiman Road San Antonio, TX 78209 mblack@burnsandblack.com  Jeffery Duke JF DUKE AND ASSOCIATES 11819 Great Oaks Drive College Station, TX 77494 jeff@jfduke.com
Ronald J. Smeberg THE SMEBERG LAW FIRM, PLLC 2010 W Kings Hwy San Antonio, TX 78201-4926 ron@smeberg.com  Counsel for Black Duck Properties, LLC	James Rose OFFICE OF THE U.S. TRUSTEE 903 San Jacinto Blvd, Room 230 Austin, TX 78701 james.rose@usdoj.gov United States Trustee
William P Germany BAYNE, SNELL & KRAUSE 1250 N.E. Loop 410, Suite 725 San Antonio, TX 78209 wgermany@bsklaw.com  Counsel for Larry Wright	Laura L. Worsham JONES, ALLEN & FUQUAY, L.L.P. 8828 Greenville Avenue Dallas, TX 75243 lworsham@jonesallen.com  Counsel for McLeod Oil, LLC

/s/ Austin H. Krist
Austin H. Krist